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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF PAULA SCHELLING
SOLDNER**

DECLARATION OF PAULA SCHELLING SOLDNER

I, Paula Schelling Soldner, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief. I am providing this declaration in my capacity as a union officer.

2. I am currently the Chairwoman of the American Federation of Government Employees ("AFGE") National Joint Council of Food Inspection Locals ("Council") and have held that position since 2019. I am also the Northern Council President of the Council. In addition, I serve as the Secretary-Treasurer of AFGE Local 666 ("Local 666" or "Union"). I was previously the President of Local 666.

3. The Council is comprised of close to 100 local unions throughout the country that represent approximately 6,500 civil servants who work at the Food Safety and Inspection Service ("FSIS") in the U.S. Department of Agriculture ("USDA"). Those employees primarily include Consumer Safety Inspectors and Food Inspectors, who inspect meat, poultry, and egg products, imported and exported food products, and slaughtering and other food processing facilities.

4. Local 666 represents a bargaining unit of approximately 65 civil servants who work at FSIS in the areas surrounding Milwaukee, Wisconsin. Those bargaining unit employees are primarily Consumer Safety Inspectors and Food Inspectors.

5. The common mission of the Council and Local 666 is to advocate for and promote the interests of bargaining unit members in their federal employment. As the exclusive bargaining representative of these workers, the Council and Union provide many services to all bargaining unit members. Core functions include collective bargaining with FSIS to obtain a fair and reasonable collective bargaining agreement ("CBA"); filing and negotiating grievances against FSIS to enforce the terms and conditions of the CBA; pursuing arbitrations on behalf of workers to enforce the CBA; and providing other support, guidance, and resources to bargaining unit employees.

1 6. I am a Consumer Safety Inspector at the Food Inspection Safety Service in the
2 USDA. I have worked there for approximately 37 years. In my role, I inspect meat, poultry, and
3 egg products and make sure that they are safe, wholesome, and properly labeled and packaged.

4 7. The Food Inspection Safety Service is responsible for protecting the safety and
5 integrity of the meat, poultry, and eggs that Americans consume. More than 6,500 FSIS
6 inspectors across the country conduct inspections every day to ensure that food producers are
7 complying with food safety regulations.

8 8. FSIS has 10 District Offices nationwide. Inspectors located in the District Offices
9 visit slaughtering and meat processing facilities throughout the region covered by the Office and
10 conduct inspections of those facilities.

11 9. Consumer Safety Inspectors inspect meat, poultry, and egg products, as well as
12 imported and exported products. For example, Consumer Safety Inspectors visit plants that
13 process eggs and inspect the plant's sanitary conditions, ensure that the eggs are handled in a
14 sanitary manner, examine the eggs, document any regulatory noncompliance, and collect egg
15 product samples to be analyzed for pathogens. The inspectors also make sure that the products are
16 properly labeled, which are especially important for people with food allergies.

17 10. In addition, FSIS has Food Inspectors who work at slaughtering and other meat
18 processing facilities. They are responsible for inspecting animals before and after slaughter on a
19 daily basis. These inspectors are the first line of defense for protecting the American people
20 against diseased and adulterated meat and poultry. Food Inspectors also inspect meat processing
21 facilities, like those around the Milwaukee area (where I live) that produce summer sausage and
22 bratwurst.

23 11. The Council first became aware of President Trump's plan to conduct "large-scale"
24 Reductions in Force ("RIFs") through the February 11, 2025, Executive Order. No one from
25 USDA or FSIS had said anything about large-scale RIFs to the Council prior to that Order.

26 12. USDA has not provided the Council with any information regarding its plans for
27 large-scale RIFs. In February, the Council submitted an information request to the FSIS
28

1 Administrator regarding the Deferred Resignation Program that FSIS offered to employees in
2 January and February, prior to initiating RIFs. But the Council never received a response.

3 13. However, I have read some online news articles reporting that USDA will be
4 making drastic cuts. For example, a Government Executive article, dated April 2, 2025, reported
5 that USDA Secretary Brooke Rollins said that the agency is planning to conduct “widespread
6 layoffs across the department” and close offices throughout the Washington D.C. area. A true and
7 correct copy of the article, which can also be found at
8 [https://www.govexec.com/management/2025/04/some-usda-rif-plans-take-shape-department-](https://www.govexec.com/management/2025/04/some-usda-rif-plans-take-shape-department-warns-employees-major-cuts/404247/)
9 [warns-employees-major-cuts/404247/](https://www.govexec.com/management/2025/04/some-usda-rif-plans-take-shape-department-warns-employees-major-cuts/404247/), is attached hereto as Exhibit A. The article reported that
10 USDA was “encourag[ing] workers to voluntarily leave government” through deferred resignation
11 programs and other offers, and around 75,000 workers have taken the deals already. Ex. A, p. 1.

12 14. Another Government Executive article, published April 7, 2025, confirmed that
13 USDA was planning to “cut back to fiscal 2019 staffing levels—which would lead to USDA
14 slashing around 9,000 of its 98,000 employees.” A true and correct copy of the article, which can
15 also be found at [https://www.govexec.com/workforce/2025/04/usda-slash-headquarters-other-](https://www.govexec.com/workforce/2025/04/usda-slash-headquarters-other-staff-and-relocate-some-new-hubs-around-country/404371/)
16 [staff-and-relocate-some-new-hubs-around-country/404371/](https://www.govexec.com/workforce/2025/04/usda-slash-headquarters-other-staff-and-relocate-some-new-hubs-around-country/404371/), is attached hereto as Exhibit B. The
17 article reported that USDA was planning a large-scale restructuring, including “dismantl[ing] its
18 presence in Washington, D.C.,” “relocat[ing] those it does not lay off to three hubs around the
19 country,” and “eliminat[ing] . . . duplicative functions.” Ex. B, p. 2. The article also noted that
20 USDA “will not renew many of its leases in the field” and will close department facilities around
21 the country. Ex. B, p. 2.

22 15. Through my conversations with FSIS leadership and other federal employees, I
23 have heard reports that FSIS is contemplating a large-scale reorganization or downsizing of its 10
24 District Offices. As I mentioned, FSIS employees are based in these District Offices throughout
25 the country and conduct inspections of slaughtering and meat processing facilities in the
26 surrounding areas. Through my conversations, I heard that FSIS is considering closing its
27 Jackson, Mississippi, District Office at the end of April 2025; has eliminated the resource
28 management staff, who handle travel, logistics and other administrative tasks, in the Raleigh,

1 North Carolina, District Office; and is likely to close its District Offices in Springdale, Arkansas,
2 and Des Moines, Iowa.

3 16. If these reports are true, FSIS will not be able to adequately carry out its
4 inspections and guarantee the safety of the meat, poultry, and egg products that Americans
5 consume.

6 17. Many employees have already taken deferred resignation or voluntary retirement
7 offers and left FSIS. As a result, FSIS is already severely understaffed, and FSIS inspectors are
8 already overworked. A lot of them have had to take on twice or three times as many inspections
9 as they typically do and work up to 12 hours a day to complete all the inspections. For example,
10 an inspector might have to visit six food processing plants in one day, with some being 100 miles
11 apart.

12 18. The inspectors try their best to ensure that the plants are operating in a sanitary way
13 and complying with safety regulations. But with such tight time constraints, their inspections
14 simply cannot be as thorough as they usually are. That increases the risk that meat, poultry, and
15 egg products are not safe or properly labeled.

16 19. If FSIS closes or significantly downsizes some of its District Offices, the inspectors
17 will have an even higher workload, which will not be possible to complete. For example, if FSIS
18 downsizes the Des Moines District Office—which currently covers Iowa, Minnesota, North
19 Dakota, South Dakota, and Wisconsin—an inspector could be assigned to inspect meat processing
20 facilities in Milwaukee and Fargo, which are almost 600 miles apart. It would be incredibly
21 difficult for an inspector to travel that far to do inspections.

22 20. That would be especially true if FSIS makes further cuts to resource management
23 staff, who arrange travel, like FSIS did in the Raleigh District Office. With its staff stretched this
24 thin, FSIS would not be able to complete all of the inspections of slaughtering and meat
25 processing plants that it is responsible for. That would have serious implications for the safety and
26 quality of meat, poultry, and eggs that Americans consume across the country.

27 21. I have also heard that FSIS is planning to drastically cut the staff of the Office of
28 Investigation, Enforcement and Audit from 250 to 60 employees. That Office surveils and

1 investigates meat, poultry, and egg products facilities for any regulatory violations or flaws in the
2 food safety systems; enforces FSIS criminal, civil, and administrative sanctions when there is
3 wrongdoing; investigates foodborne illness outbreaks; and responds to natural disasters and
4 intentional contamination incidents, among other duties.

5 22. The American public relies on that Office to ensure that food safety is protected
6 and any wrongdoing is punished. For example, if an FSIS inspector sees an issue with a food
7 processing plant they are inspecting, they will notify the Office of Investigation, Enforcement and
8 Audit, and the Office will initiate an investigation. The Office also handles consumer complaints
9 about food safety issues. If its staff is reduced by almost 80% (from 250 to 60), the Office will not
10 be able to carry out these important responsibilities, posing serious threats to food safety and
11 public health throughout the country.

12 23. USDA's planned reorganization and RIFs directly threaten the ability of the
13 Council and the local unions comprising it to provide core services to bargaining unit members
14 and to accomplish their mission. The local unions' staff and activities are funded through
15 members' voluntary dues, most of which are paid through payroll deductions. If the unions no
16 longer receive dues from members who are laid off in a large-scale RIF or otherwise leave
17 employment without being replaced, that will make it significantly more difficult for the unions to
18 continue to function and to provide the services and protection to the bargaining units identified
19 here.

20 24. For example, unions will lose funding for staff who can help their members
21 navigate grievance, investigation, and unfair labor practice processes. Union representatives
22 themselves might also be terminated from FSIS as a result of the RIFs and would thus not be able
23 to provide valuable representation to members.

24 25. In addition, many members are very concerned about the prospect of large-scale
25 RIFs, given reports of USDA's plans to terminate approximately 9,000 employees.
26 Understandably, they are worried about the prospect of losing their employment, health insurance,
27 and other benefits. Responding to all of their questions and trying to reassure members takes a lot
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1 of time, and the diversion of time toward those efforts threatens the ability of the unions to provide
2 core services to bargaining unit members and to accomplish their mission.

3 26. I have worked in the federal government for approximately 37 years and have
4 experienced prior government shutdowns. For example, the shutdown from December 2018–
5 January 2019 had significant impacts on the bargaining unit members of the local unions
6 comprising the Council. Many FSIS employees did not receive paychecks during that time, which
7 affected their ability to pay their bills. Any large-scale RIFs at FSIS would have even more
8 serious effects on these employees' livelihoods and cause employees to lose healthcare and other
9 valuable benefits tied to their employment at FSIS.

10 27. In 2018, the Council provided comments during the public comment period for the
11 reorganization plan that Trump proposed during his first Term. If the current reorganization and
12 large-scale RIF plans had been published in the Federal Register for notice and comment, the
13 Council would have commented on those plans as well, given the significant impacts on the
14 Council, the employees that it represents, and the consumers that it protects.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct. Executed April 30, 2025, in Kansas City, Kansas.

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19 Paula Schelling Soldner
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Exhibit A

Government Executive

Some USDA RIF plans take shape as department warns employees of major cuts

By Eric Katz

April 2, 2025

The Agriculture Department is warning its employees it will soon identify “duplicative” or “redundant” functions to eliminate, including through the closure of offices throughout the Washington region.

The changes will result in widespread layoffs across the department of nearly 100,000 employees, USDA Secretary Brooke Rollins said in a message to staff on Tuesday, who issued the cautionary note to encourage workers to voluntarily leave government. Like several other agencies in recent days, USDA reopened the window to take paid leave through September before separating from federal service. The so-called “deferred resignation program” was first offered to virtually all federal employees in February and around 75,000 workers accepted the deal.

In the coming weeks, USDA will be “optimizing and reducing the size of the workforce to become more efficient,” Rollins said. She made clear the department cannot offer “full assurance regarding which positions will remain—or where they will be located—after USDA’s restructuring.”

The elimination of duplicative functions will focus on business support roles, the secretary said, and eliminating “unnecessary management layers.” The department will relocate employees away from Washington to be “closer to the farmers, ranchers, foresters and consumers we serve,” she added.

That will lead to closing department facilities to minimize its footprint in the capital region, as well as some other parts of the country.

Some of the layoff plans have begun to take shape. According to a source briefed on the matter, the U.S. Forest Service is planning to consolidate its nine regional offices into as few as three. USFS’ research team, which focuses on priorities such as new tools to model fire risk, markets, forest restoration and water and employs around 1,500 people, is expected to face cuts. The agency’s five Research Stations are slated to be pared back. The nation’s 154 National Forests are expected to be consolidated and the plan is to move the Wildland Fire division into another part of the government. USFS’ Washington headquarters is slated to be “hollowed out,” the source said.

Rollins noted the upcoming RIFs in reopening the window for the deferred resignations, or DRP, which employees have until April 8 to accept. Employees who accept the offer will be placed on paid administrative leave between April 15 and April 30. Those eligible can also accept an early retirement incentive.

Not all employees will be eligible for the DRP offer. At the Forest Service, for example, warranted law enforcement officials, mobile radio telecommunications and electronics technicians and specialists and firefighters at the General Schedule-10 level and below cannot take it.

One USDA employee told *Government Executive* she will accept the offer to get closer to retirement eligibility—and because she wants out of an administration that is constantly creating threats that linger over her head.

“I can’t stand another four years of this mental roller coaster,” the employee said. “It’s just all too much, reading and hearing about people getting RIF emails after hours and then they can’t even get back into buildings to get their personal belongings.”

The employee was also optimistic some good will come of her decision.

“I’d like to hope that my leaving will save one other younger person from getting RIF’d,” she said.

A union official at USDA said he has heard from a far larger pool of employees who plan to accept the offer this time around. His group has not received any communication from the department on its RIF plans.

USDA joins the General Services Administration, [Small Business Administration](#) and the departments of Housing and Urban Development, Defense and Energy in offering a second round of DRP. Several unions led by the American Federation of Government Employees have [renewed their challenge of the program](#), suggesting the administration should have issued new regulations to implement it.

Unlike the original offer, which OPM sent to all agencies, an administration official told *Government Executive* that the new wave of deferred resignation offers was not part of any governmentwide effort and was the result only of individual agency decisions.

An official at an agency not planning to offer a renewed deferred resignation window said OPM has encouraged agencies to utilize early retirements and buyouts—as many have done—and to grant administrative leave (i.e. through a DRP offer) on top of that at their own discretion. The official said their agency did not want employees potentially subject to RIFs to be sitting on administrative leave when the layoffs occur.

While the administration has said agencies are operating independently, at least USDA and SBA have used identical language in announcing the second DRP to employees.

By Eric Katz

April 2, 2025

<https://www.govexec.com/management/2025/04/some-usda-rif-plans-take-shape-department-warns-employees-major-cuts/404247/>

Exhibit B

Government Executive

USDA to slash headquarters, other staff and relocate some to new 'hubs' around the country

By Eric Katz

April 7, 2025

The Agriculture Department is planning to dismantle its presence in Washington, D.C., according to several officials briefed on the plans, and will relocate those it does not lay off to three hubs around the country.

The locations for those new offices have not yet been determined, senior officials throughout the department have told employees in recent days, but the shakeup will impact thousands of headquarters staff. USDA is expected to offload one of its two Washington headquarters buildings, according to two employees familiar with the matter.

The relocations will accompany widespread layoffs at the department, according to four officials made aware of the plans, though the exact number is not yet clear. Those cuts are expected in late April or early May. Some employees have been told to expect the department to cut back to fiscal 2019 staffing levels—which would lead to USDA slashing around 9,000 of its 98,000 employees—while others have been told there is a an overall federal workforce reduction number the administration has developed and the department will do its part proportionally to meet that target.

The department did not respond to a request for comment but previewed these types of changes on Secretary Brooke Rollins' first day in office.

“USDA is pursuing an aggressive plan to optimize its workforce by eliminating positions that are no longer necessary, bringing its workforce back to the office, and relocating employees out of the National Capital region into our nation’s heartland to allow our rural communities to flourish,” it said at the time.

Rollins reiterated that threat when USDA offered a second round of “deferred resignations” to employees, a program that will allow volunteers to take paid leave through September when they must leave government.

In the coming weeks, USDA will be “optimizing and reducing the size of the workforce to become more efficient,” the secretary said. She made clear the department cannot offer “full assurance regarding which positions will remain—or where they will be located—after USDA’s restructuring.”

The elimination of duplicative functions will focus on business support roles, the secretary said, and eradicating “unnecessary management layers.” The department will relocate employees away from Washington to be “closer to the farmers, ranchers, foresters and consumers we serve,” she added.

USDA told employees that would lead to closing department facilities to minimize its footprint in the capital region, as well as some other parts of the country.

Department employees have been told they will no longer be able to work remotely, so any worker who survives the upcoming RIFs and lives more than 50 miles from one of the new hubs will have to relocate. USDA plans to consolidate mission areas and administrative functions currently spread throughout the department and employees in those programs will report to the hubs, senior executives have told employees in messages reviewed by *Government Executive*.

The department will not renew many of its leases in the field and impacted staff will also have to relocate to the hubs. Other employees who work in functions being eliminated or consolidated may have the opportunity to apply to openings in the new hubs, officials said.

One Agricultural Research Service executive told employees in a recent meeting that some employees will “lose their jobs” and “there are going to be consolidations,” but he did not have details on the scope of those changes. He criticized the administration’s approach to the cuts.

“Their view of what efficiency looks like is not one that takes into account how we really do work in the real world and the federal government writ large,” the executive said. “They think that creating hubs where everybody has exactly the same thing that they do is great.”

The official added that while the administration believes those things, “We all know that's not true, so they're not looking at facts. They're just making decisions based on their preconceived ideas about how things should be.”

That executive said the Elon Musk-backed Department of Government Efficiency was making the decisions on where cuts will take place.

The RIF plans may hit some USDA components harder than others. The Natural Resources Conservation Service, for example, received billions of dollars through the Inflation Reduction Act and increased its staffing levels accordingly. A cut to match its workforce in fiscal 2019, as employees have been told is the goal, would lead to a reduction of around 23% of the agency’s more than 11,000 employees. Some of those RIFs may be staved off depending on how many employees accept the deferred resignation offer or an early retirement incentive.

The U.S. Forest Service is planning to consolidate its nine regional offices into as few as three, according to a source briefed on the matter, while also eliminating some of its five Research Stations. The nation’s 154 National Forests are expected to be consolidated and the plan is to move the Wildland Fire division into another part of the government. Like much of USDA, USFS’ Washington headquarters is slated to be “hollowed out,” the source said.

The window to accept the deferred resignation offer expires Tuesday and employees expect to learn more details, potentially including the location of the hubs, at that time. USDA is expected to offer buyouts of up to \$25,000 to employees in the coming days. Employees told *Government Executive* they lamented having to make a life-altering decision without complete information.

“I don’t know what to do,” said an Agricultural Research Service employee. “As a manager, [I] want to be there for my staff, but [I am] watching management getting axed first in other agencies. Not sure I can help anybody. I am committed to my work but starting to feel hopeless.”

In 2019, the department relocated the Agriculture Department’s Economic Research Service and National Institute of Food and Agriculture to Kansas City, Mo., over the objections of employees and some lawmakers. Following the move, both agencies lost more than half of their staff, leading to a [significant loss of productivity](#) from which it took the agencies [years to recover](#). Under President Biden, both agencies moved their headquarters back to Washington while maintaining their Kansas City offices.

Employees who accepted those relocations received relocation assistance. USDA has not indicated whether it will provide relocation packages to those it requires to relocate this time around.

By Eric Katz

April 7, 2025

<https://www.govexec.com/workforce/2025/04/usda-slash-headquarters-other-staff-and-relocate-some-new-hubs-around-country/404371/>